

- 1 1. On January 29, 2021, Defendant Burleson filed his motion for compassionate
2 release. E.C.F. No. 3522.
- 3 2. On February 3, the parties filed a stipulation agreeing to a 24 day extension of time
4 for the government to file its response to that motion due to government counsel's
5 scheduling conflicts. E.C.F. No. 3523. That stipulation was granted the following
6 day. E.C.F. No. 3524.
- 7 3. On March 1, 2021 the government filed its response to the compassionate release
8 motion. E.C.F. no. 3529.
- 9 4. Due to the need to get the government's response to the defendant in prison in
10 Florida, consult with him, and then possibly get a new declaration sent to him and
11 returned, and due also to defense counsel's schedule on other matters, defense
12 counsel requested a first, 14 day extension of time to and including March 22, 2021 to
13 file his reply.
- 14 5. Upon receiving the government's brief, undersigned counsel immediately sent Mr.
15 Burleson a copy via Priority Mail. When after some time had passed he had not yet
16 received it (common with prison mail), I sent a second copy by overnight mail. Since
17 I learned that he had finally received it, defense counsel has been repeatedly
18 attempting to arrange a legal call to obtain Mr. Burleson's input, including calling the
19 prison each day for the past five days; I have still been unable to reach a person who
20 could arrange such a call. Today, for the first time, a few days before the current due
21 date, I was able to speak with Mr. Burleson. Our conversations are ongoing, since
22 they are limited to 10 minutes each, requiring multiple calls. In the first such call,
23 Mr. Burleson raised some issues that will require additional research, and possibly
24 result in sending him a declaration. For these reasons, and taking into account
25 defense counsel's two other compassionate release briefs due on March 29 and April
26 2, defendant is respectfully requesting a second 14 day extension of time to file his
27 reply.
- 28

6. This request is not for the purpose of delay. One prior 14 day extension has been requested and granted for this reply brief. Defendant Greg Burleson is currently serving an 819 month federal prison sentence in USP Coleman II in Florida.

7. Government counsel, AUSA Steven Myhre, agrees to this extension.

WHEREFORE, the parties respectfully request that the Court accept this Stipulation and enter an Order requiring the defense to file its Reply to the government's Response to the defendant's compassionate release motion on or before **April 5, 2021**. For the convenience of the Court, a draft Order has been prepared and is attached to this Stipulation.

DATED this 17th day of March, 2021.

// s // Steven Myhre

STEVEN MYHRE

Assistant United States Attorney
Counsel for the United States

// s // Mark D. Eibert

MARK D. EIBERT

Counsel for Defendant Gregory Burleson

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES,

Plaintiff,

vs.

GREGORY BURLESON,

Defendant.

No. 2:16-cr-046-GMN-NJK

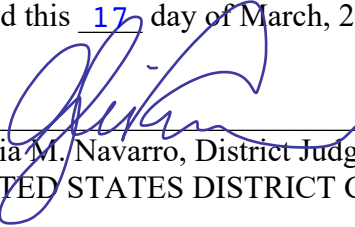
ORDER

This matter coming on the parties' Stipulation for Extension of Time to File Defendant's Reply to Government's Response to the defendant's compassionate release motion (E.C.F. No. 3522, 3529), the Court having considered the premises therein, and for good cause shown, the Court accepts the Stipulation and **ORDERS** as follows:

1. The filing date for the defendant's reply, presently set for March 22 is **VACATED** and **CONTINUED**:
2. The defendant's reply shall be filed on or before **April 5, 2021**.

IT IS SO ORDERED.

Dated this 17 day of March, 2021.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that his business mailing address is P. O. Box 1126, Half Moon Bay, CA 94019, that he is not a party to this action, that he is a citizen of the United States of such age and discretion to be competent to serve papers, and that on the below date he caused a true and accurate copy of

STIPULATION FOR EXTENSION OF TIME AND PROPOSED ORDER

To be served via ECF on the United States District Court, which will e-serve counsel of record in this case, including the following:

STEVEN MYHRE, ESQ.
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, NV 89101

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief. Executed on March 17, 2021 at Half Moon Bay, California.

/s/ Mark D. Eibert